

Remarks**I. Claim Status:**

Claims 1 through 6 are pending and stand rejected. Claims 1-6 are amended to address minor grammatical issues. No new subject matter is introduced by these amendments. Entry and consideration of the claims as amended are respectfully requested.

II. Rejections under 35 U.S.C. § 102:

Claims 1-3 and 6 stand rejected under § 102(e) as being anticipated by Kagan et al. (2005/0006380 A1). Applicants respectfully traverse the rejection under § 102(e).

Submitted herewith is a copy of an English-language translation of the priority document showing a priority date that precedes the effective date of Kagan et al. Due to the priority date preceding the Kagan et al. effective date, Kagan et al. cannot properly be considered as a prior art reference under § 102(e). Reconsideration and withdrawal of the rejections of claims 1-3 and 6 under § 102(e) are respectfully requested.

III. Rejections under 35 U.S.C. § 103(a):

Claims 1-6 stand rejected under 35 U.S.C. § 103(a) as being obvious over Ajmera et al. (4,839,127) in view of Kagan et al. and Yoshikawa et al. (3,880,973). Applicants respectfully traverse the rejections.

As conceded, Ajmera does not disclose or suggest an electrical heater positioned between a mold holder and a mold as recited in all the claims. The reference

used to fill this deficiency in Ajmera is the Kagan et al. reference, which cannot properly be considered a prior art reference for the reasons given herein above.

Yoshikawa et al. also does not disclose or suggest an electrical heater positioned between a mold holder and a mold. As shown in FIGS. 1, 3 and 4 of Yoshikawa et al., mold halves 4 and 4' in one embodiment are made of metal and connected to electric heating elements that **are not** displaced between the mold halves and what are interpreted to be mold holders 2 and 2'. To the contrary, insulating films 3 and 3' are deposited on mold holders 2 and 2' and sandwiched between the mold holders and the mold halves 4 and 4'. Mold halves 4 and 4' are instead electrically connected to the heating elements via leads 5, 5', 6 and 6' exterior to the interface of the mold halves and mold holder halves. [3:4-20]

In a second embodiment, mold halves 9 and 9' are coated with a metal coating 14 and 14', respectively. The coatings 14 and 14' act as heating elements that are shown in direct contact with the material being molded. Leads 10, 10', 11 and 11' are electrically connected to the coatings and conduct current directly to the coatings 14 and 14'. As shown in FIGS. 2 and 5, there is no interface between a mold holder and a mold into which a heating element is inserted. [3:22-31] The mold itself is the heating element, which teaches away from Applicants' claimed invention to have a discreet heating element **between** mold holders and molds. Accordingly, Yoshikawa et al. does not show or suggest heating elements between molds and mold holders and does not fill the noted and conceded deficiency of Ajmera.

For these reasons, Ajmera et al. cannot properly be combined with Kagan et al. and/or Yoshikawa et al. to obviate Applicants' claimed invention. Reconsideration and removal of the rejections of claims 1-6 under § 103(a) are respectfully requested.

IV. Conclusion:

The claims are considered to define patentably over the prior art.

Reconsideration is requested and favorable action is solicited.

Respectfully submitted,



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